

Received & Inspected

JUN 2 2015

FCC Mail Room



Telephone Company

100 REDBUD RD. P.O. BOX 230 VIRGINIA, ILLINOIS 62691-0230
217-452-3022 www.casscomm.com 800-508-5405

REDACTED FOR PUBLIC INSPECTION

Via overnight delivery

June 26, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street S.W.
Room 5-A225
Washington, D.C. 20554

**RE: FCC FORM 481 – CARRIER ANNUAL REPORTING DATA
COLLECTION CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-0135, 05-337, 03-
109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET
NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
(FILED IN DOCKETS 14-58 AND 11-42) AND CONFIDENTIAL FINANCIAL
INFORMATION FILED PURSUANT TO SECTIONS .457 AND .459 OF THE
FEDERAL COMMUNICATIONS COMMISSION RULES**

Dear Ms. Dortch,

In accordance with the annual reporting requirements of 47 C.F.R. §54.313, Cass Telephone Company (Cass) is submitting FCC Form 481 via the FCC's Electronic Comment Filing System (ECFS). Section 3005 requires the filing of financial information per 47 C.F.R. §54.313(f)(2). In this ECFS filing, Cass has redacted confidential financial information per Protective Order, DA 12-1857.

This information was filed on line with USAC and will be filed no later than July 1st with the Illinois Commerce Commission.

In addition, two copies of this cover letter and each page containing redacted confidential information marked "REDACTED FOR PUBLIC INSPECTION" are being filed via overnight delivery with the Secretary. Included in that delivery are a copy of the cover letter and confidential information stamped "Confidential financial information subject to protective order in WC Docket Nos. 10-90, 07-0135, 05-337,

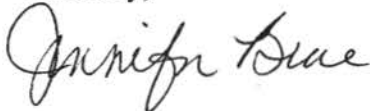
No. of Copies rec'd _____
List ABCDE _____

03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, before the Federal Communications Commission.”.

In addition, two copies of the cover letter and confidential information stamped “Confidential financial information subject to protective order in WC Docket Nos. 10-90, 07-0135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, before the Federal Communications Commission.” are being filed with Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, 445 Twelfth Street S.W., Room 5-A452, Washington, D.C. 20554. This is in accordance with the Protective Order.

Please contact me with any questions you have on these filings.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Brue".

Jennifer Brue
Accounting Department
Cass Telephone Company
(217) 452-7800
jennifer.brue@casscabletv.com

<010> Study Area Code	340984	
<015> Study Area Name	CASS TEL CO	Received & Inspected
<020> Program Year	2016	
<030> Contact Name: Person USAC should contact with questions about this data	Jennifer Brue	/// - 2 2015
<035> Contact Telephone Number: Number of the person identified in data line <030>	2174527800 ext.	FCC Mail Room
<039> Contact Email Address: Email of the person identified in data line <030>	jbrue@casscomm.com	

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div>340984IL510.pdf</div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div>340984IL610.pdf</div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div>340984IL1010.pdf</div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Service Quality Standards Compliance

Per Subpart A, Section 730.100 of Title 83, Chapter 1, Subchapter f of the Illinois Administrative Code, Cass Telephone Company is required to meet the service quality standards contained in Section 730. Subpart E of this section addresses "Standards of Quality of Service". Subpart A, Section 730.115 requires the quarterly reporting of various installation, repair and answer time data for Illinois Commerce Commission and public review.

Consumer Protection Rules Compliance

Cass Telephone Company complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and Subpart Y, Truth in Billing Requirements for Common Carrier, and Federal Trade Commission Red Flag rules to prevent identity theft. A Company Manual for CPNI and Red Flags is in place and employee training is conducted annually. New hires are instructed on the programs as required by their job functions.

Cass Telephone Company (Cass) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)1 and Subpart A, Section 730.325 of Title 83, Chapter 1, Subchapter f of the Illinois Administrative Code.

Description of Functionality in Emergency Situations

- 1) Cass has an emergency plan in place per Subpart A, Section 730.325(a) of Title 83, Chapter 1, Subchapter f of the Illinois Administrative Code.
- 2) Cass has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.
- 3) Specifically, Cass has two wire centers. The Virginia central office has a natural gas powered generator backing up a 48 volt battery system which is capable of powering the equipment for 8 hours with no outside power source. The Easton central office has a natural gas powered generator backing up a 48 volt battery system. All remote cabinets have batteries capable of lasting 8 to 10 hours with no outside power source and are equipped with connections for a portable generator. Voice service is powered off either the serving central office or the closest remote cabinet.

Voice Services Rate Comparability Information for Cass Telephone Company

As evidenced by the data provided on line 700 of FCC Form 481, the Company's voice service pricing is no more than 2 standard deviations above the national average urban rate (\$47.48) as announced by the Wireline Competition Bureau in April, 2015 (DA 15-470).

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	340984
<015>	Study Area Name	CASS TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jennifer Brue
<035>	Contact Telephone Number - Number of person identified in data line <030>	2174527800 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrue@casscomm.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

340984IL112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Yes

REDACTED – For Public Inspection

**Telephone Company**

100 REDBUD RD. P.O. BOX 230 VIRGINIA, ILLINOIS 62691-0230
217-452-3022 www.casscomm.com 800-508-5405

Cass Telephone Company ("the Company")**2015 PROGRESS REPORT ON SERVICE QUALITY
IMPROVEMENT PLAN****INTRODUCTION**

This document is an integral part of the Company's 2015 Annual Report, as attached to Form 481. It is in compliance with §54.313(a)(1) adopted in the FCC's USF/ICC Transformation Order (11-161). The document incorporates further clarifications identified in subsequent Reconsideration Orders, as applicable, that were in effect at the time the Annual Report was due by Rule, to the requisite regulatory authorities.

The Company has carefully developed its improvement plan, concentrating on the delivery and continuation of a robust network which provides, at a minimum, the federally required voice and broadband connectivity as stipulated by regulatory rule. In certain situations (and as noted herein), the plan may also incorporate specific state requirements.

The Company advises that this improvement plan has been carefully crafted, matching measured network deployment, improvement and quality service levels with known financial implications of the Transformation Order upon the company's support cash-flows. The uncertainty of such cash flows being received in the outer-years as a result of current and potential regulatory action on rural rate-of-return carriers has resulted in the Company taking a balanced yet realistic approach.

The environment in which the Company operates remains dynamic, not static. As a result, the Company reserves the opportunity to modify its plan in response to further regulatory decisions as they are adopted, and their implication upon the Company's financial viability in providing the required services and service level quality becomes known.

The Company will re-evaluate this plan on an annual basis. Action, however, may also be taken abruptly on the presented plan for both current and outer years in the event of evolving regulatory conditions and/or changes in technology (vendor)-driven support. All adjustments to the improvement plan in this document will be reflected and explained in subsequent annual reports.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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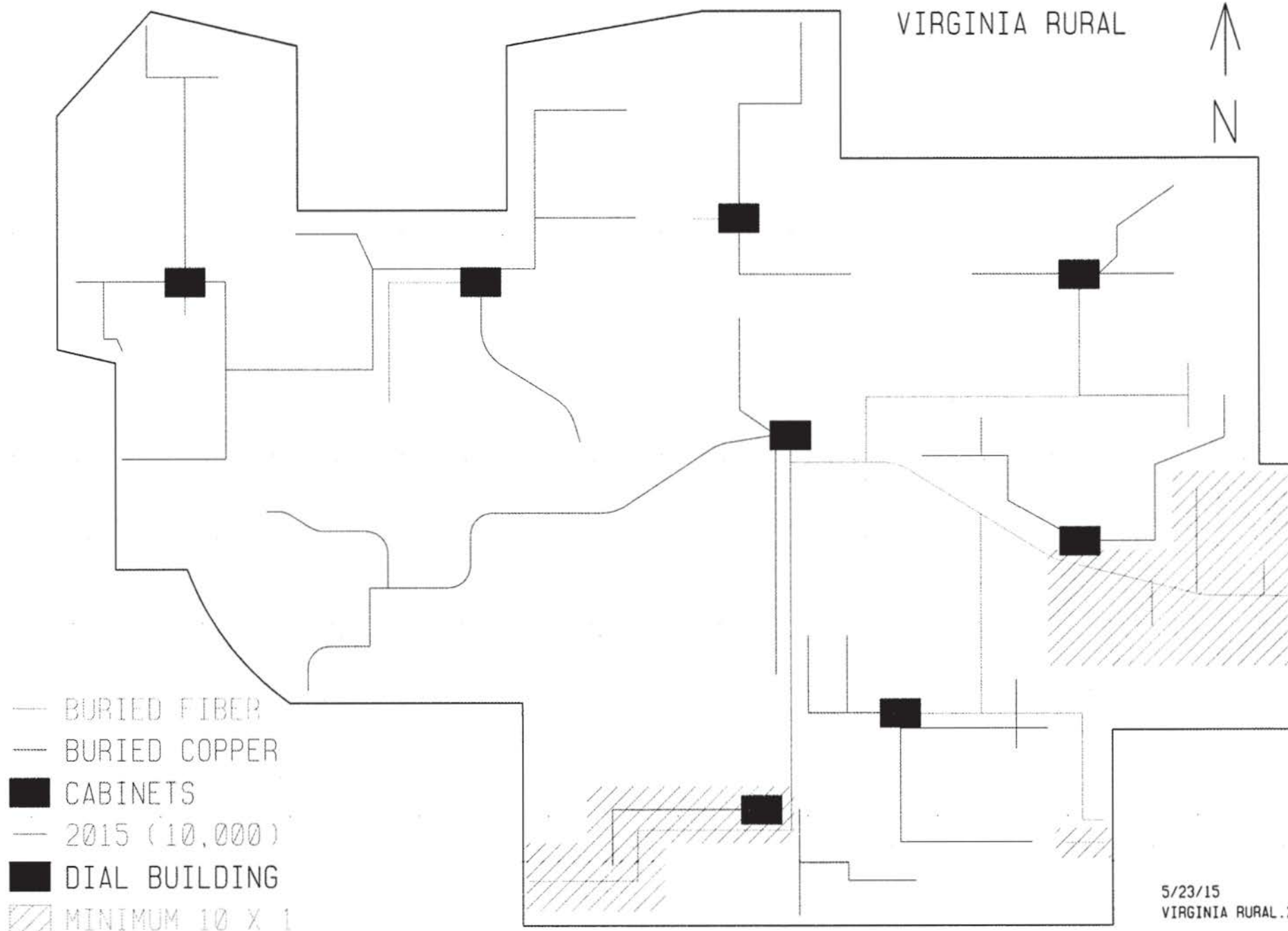
NETWORK IMPROVEMENT PROJECTS and MAINTENANCE COSTS - For Year 2015
AS OF 2015 ANNUAL REPORT SUBMISSION - JULY 1, 2015





340984IL112

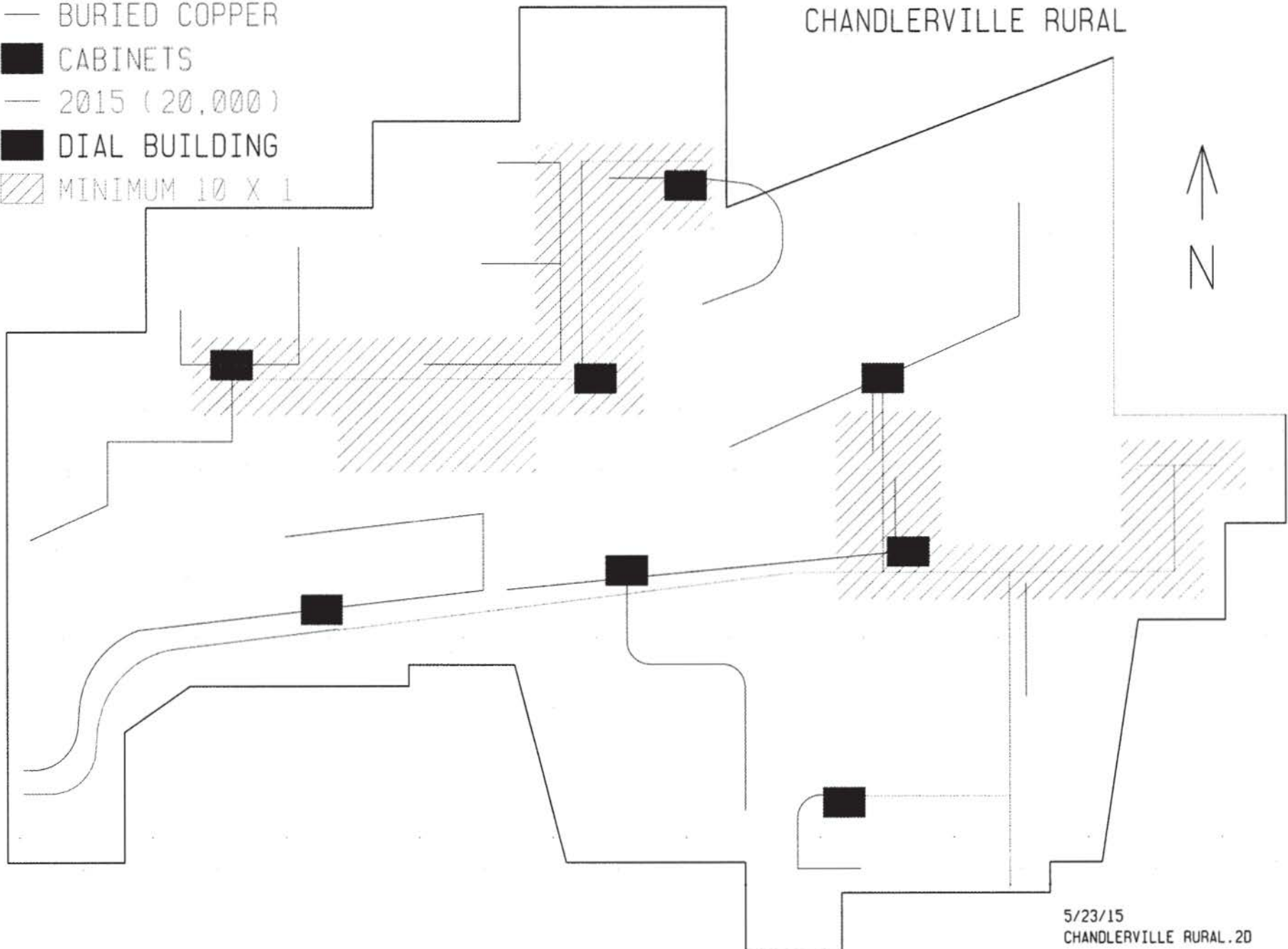
VIRGINIA RURAL



5/23/15
VIRGINIA RURAL.2D

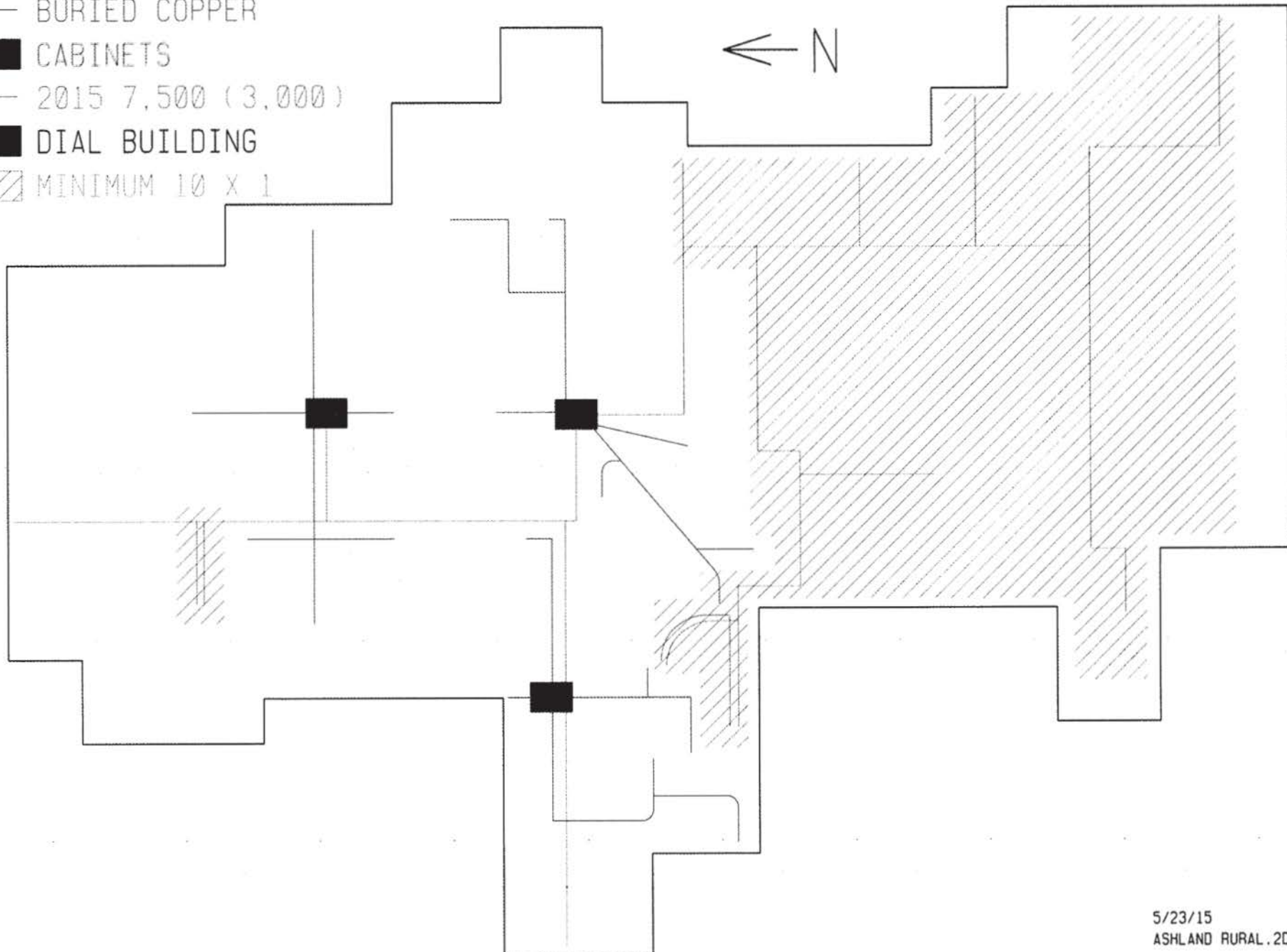
- BURIED FIBER
- BURIED COPPER
- CABINETS
- 2015 (20,000)
- DIAL BUILDING
- ▨ MINIMUM 10 X 1

CHANDLERVILLE RURAL

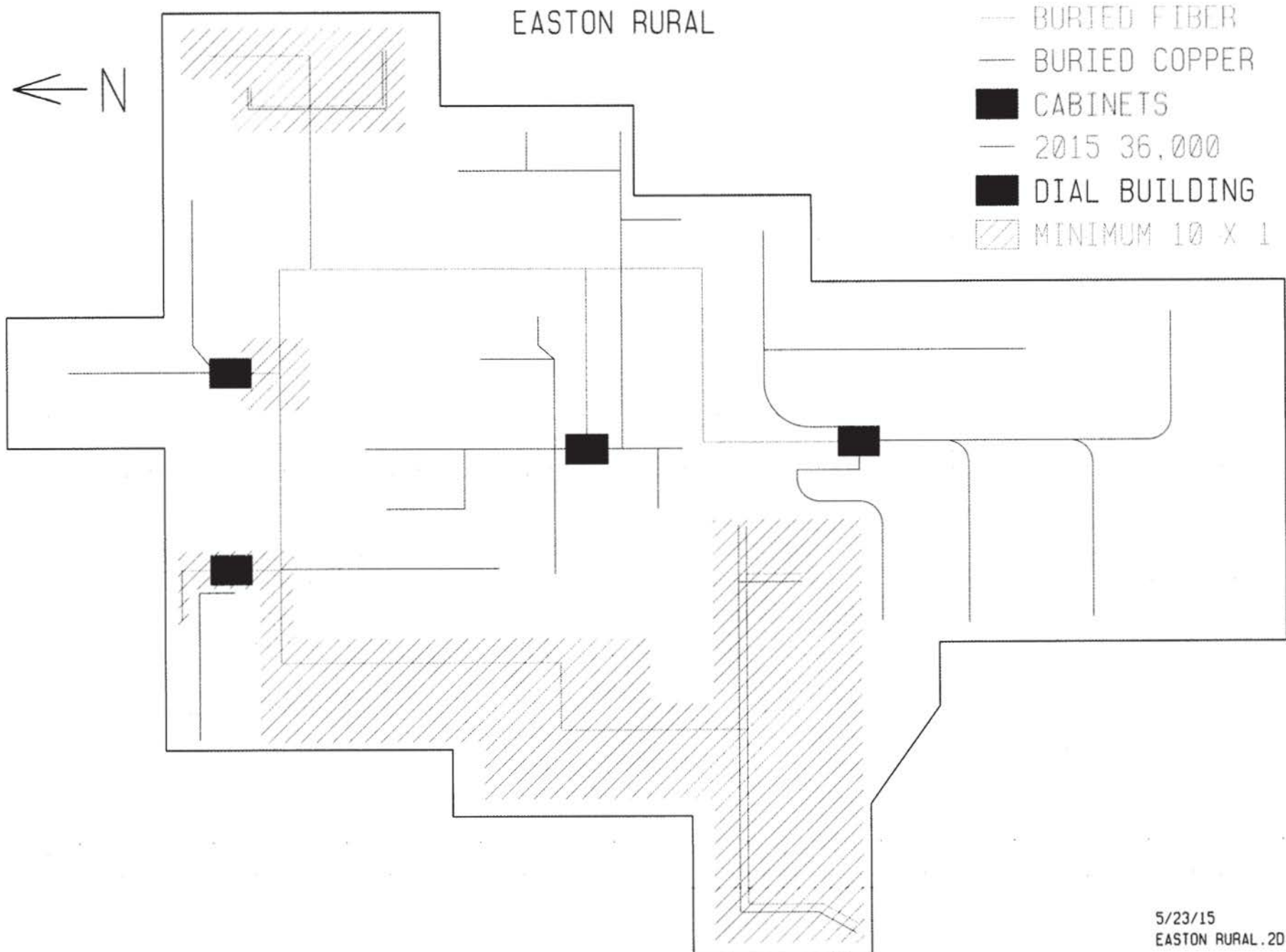


ASHLAND RURAL

- BURIED FIBER
- BURIED COPPER
- CABINETS
- 2015 7,500 (3,000)
- DIAL BUILDING
- ▨ MINIMUM 10 X 1



340984IL112



(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	340984
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<015> Study Area Name	CASB TEL CO

<020> Program Year	2016
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<030>	Contact Name - Person USAC should contact regarding this data	Jennifer Brue
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<035> Contact Telephone Number - Number of person identified in data line <030> 2174527800 ext.

<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrue@casa.com
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<220>	<a>	<b1>	<b2>	<b3>	<b4>	<c1>	<c2>	<d>	<e>	<f>	<g>	<h>
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[illegible]

<010>	Study Area Code	340984
<015>	Study Area Name	CASS TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jennifer Brue
<035>	Contact Telephone Number - Number of person identified in data line <030>	2174527800 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrue@casscomm.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2015

<703>

[illegible]

<010>	Study Area Code	340984
<015>	Study Area Name	CASS TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jennifer Brue
<035>	Contact Telephone Number - Number of person identified in data line <030>	2174527800 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrue@casscomm.com

[illegible]

<010>	Study Area Code	340984
<015>	Study Area Name	CASS TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jennifer Brue
<035>	Contact Telephone Number - Number of person identified in data line <030>	2174527800 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrue@casscomm.com
<810>	Reporting Carrier	Cass Telephone Company
<811>	Holding Company	Not Applicable
<812>	Operating Company	Cass Telephone Company

[illegible]

<010>	Study Area Code	340984
<015>	Study Area Name	CASS TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jennifer Brue
<035>	Contact Telephone Number - Number of person identified in data line <030>	2174527800 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrue@casscomm.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable



<010>	Study Area Code	340984
<015>	Study Area Name	CASS TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jennifer Brue
<035>	Contact Telephone Number - Number of person identified in data line <030>	2174527800 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbrue@casscomm.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).



<010>	Study Area Code	340984
<015>	Study Area Name	CASS TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jennifer Brue
<035>	Contact Telephone Number - Number of person identified in data line <030>	2174527800 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	1brue@casscomm.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

340984IL1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |